

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

09 Cr. 00660 (JG)

– *against* –

: Filed Electronically

BETIM KAZIU,

: NOTICE OF MOTION FOR
JUDGMENT OF ACQUITTAL
PURSUANT TO RULE 29 (c),
FED.R.CRIM.P.

Defendant.

:

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PLEASE TAKE NOTICE, that upon the annexed Declaration of Joshua L. Dratel, Esq., the accompanying Memorandum of Law, and all prior papers and proceedings herein, the defendant, BETIM KAZIU, will move before the Honorable John Gleeson, United States District Judge for the Eastern District of New York, at the United States Courthouse located at 225 Cadman Plaza East, Brooklyn, New York 11201, as soon as counsel may be heard, for the following relief:

- (a) a judgment of acquittal on all four counts of conviction pursuant to Rule 29 (c), Fed.R.Crim.P.; and

for any such other and further relief as to the Court seems just and proper.

Dated: 16 September, 2011
New York, New York

Respectfully submitted,

/S/ Joshua L. Dratel
Joshua L. Dratel
Dratel & Mysliwiec, P.C.
Two Wall Street
Third Floor
New York, New York 10005
(212) 732-0707
jdratel@dratelmys.com

David Stern
Rothman Schneider Soloway & Stern LLP
100 Lafayette Street
Suite 501
New York, New York 10013
(212) 571-5500
dstern@rssslaw.com

Henry J. Steinglass
299 Broadway
Suite 1802
New York, New York 10007
(212) 406-7700
hjsteinglasslaw@earthlink.net

Attorneys for Defendant Betim Kaziu

To: CLERK OF THE COURT

UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

ALL DEFENSE COUNSEL